

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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ENOCH BROWN, *on behalf of himself, FLSA  
Collective Plaintiffs and the Class,*

Plaintiff,

v.

ABBOTT TRUCKING INC, and  
RICKY ABBOTT,

Defendants.

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**Case No.: 1:22-cv-02196**

**OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Abbott Trucking Inc, and Ricky Abbott (collectively, “Defendants”) hereby offer to allow judgment to be taken against them, jointly and severally, and in favor of Plaintiff Enoch Brown (“Plaintiff”), in the sum of Seventy-Two Thousand Dollars and No Cents (\$72,000.00) (“Judgment Amount”), to resolve all of Plaintiff’s claims against Defendants.

Payment on the Judgment Amount shall be funded as follows: (i) initial payment in the amount of \$10,000, due on or before February 10, 2023, and (ii) eleven (11) equal monthly installments, starting from March 10, 2023 through January 10, 2024, each in the amount of \$5,636.36. In the event of any late payment, the remaining balance shall be accelerated, due and owing immediately. Defendants shall be liable for a late payment penalty of 10%, compounded monthly (or the highest interest rate allowed by law), accruing automatically on any outstanding balance and no notice from Plaintiff shall be required.

This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and neither this Offer of Judgment nor any judgment that may result from this

Offer of Judgment shall be construed as either an admission of liability on the part of Defendants, or any of them, or that Plaintiff has suffered any damages.

This Offer of Judgment is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure, and shall be deemed withdrawn unless Plaintiff serves written notice of his acceptance within fourteen (14) days of the date on which this Offer of Judgment was served. Any evidence of this Offer of Judgment shall be inadmissible except as provided in Rule 68 of the Federal Rules of Civil Procedure.

Dated: New York, New York  
January 13, 2023



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CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2023, I caused Defendants' Offer of Judgment to be served, via electronic mail, upon Plaintiff's counsel of record in this matter:

C.K. Lee, Esq.  
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By:

  
Michael K. Chong, Esq.